

**Updated Coordinated Public Transit-Human Services Transportation Plan
Michigan Department of Transportation
Office of Passenger Transportation
November 2014**

The Michigan Department of Transportation's (MDOT) Office of Passenger Transportation is providing this information to assist transit agencies with updating their Coordinated Public Transit-Human Services Transportation Plan. We have included both federal requirements and MDOT guidance for plan development.

Federal transit law, as amended by MAP-21, requires that projects selected for funding under the Section 5310 program be "included in a locally developed, coordinated public transit-human services transportation plan" and that the plan be "developed and approved through a process that includes participation by seniors, individuals with disabilities, representatives of public, private, and nonprofit transportation and human services providers and other members of the public."

You may have developed a coordinated plan under SAFETEA-LU that could be used as a foundation for a coordinated plan that includes the required elements and meets the requirements of 49 U.S.C. 5310. That plan may be updated to account for new stakeholders, eligibility, and MAP-21 requirements. The Federal Transit Administration (FTA) maintains flexibility in how projects appear in the coordination plan. Projects may be identified as strategies, activities, and/or specific projects addressing an identified service gap or transportation coordination objective articulated and prioritized within the plan.

DEVELOPMENT OF THE UPDATED COORDINATED PUBLIC TRANSIT-HUMAN SERVICES TRANSPORTATION PLAN.

- a. **Overview.** A locally developed, coordinated public transit-human services transportation plan (coordinated plan) identifies the transportation needs of individuals with disabilities and seniors; provides strategies for meeting those local needs; and prioritizes transportation services and projects for funding and implementation. Local plans may be developed on a local, regional, or statewide level. The decision as to the boundaries of the local planning areas should be made in consultation with the state, designated recipient, and the MPO, where applicable. The agency leading the planning

process is decided locally and does not have to be the state or designated recipient.

In UZAs where there are multiple designated recipients, there may be multiple plans and each designated recipient will be responsible for the selection of projects in the designated recipient's area. A coordinated plan should maximize the programs' collective coverage by minimizing duplication of services. Further, a coordinated plan must be developed through a process that includes participation by seniors, individuals with disabilities, representatives of public, private and nonprofit transportation and human service transportation providers, and other members of the public. While the plan is only required in communities seeking funding under the Section 5310 program, a coordinated plan should incorporate activities offered under other programs sponsored by federal, state, and local agencies to greatly strengthen its impact.

- b. Required Elements. Projects selected for funding shall be included in a coordinated plan that minimally includes the following elements at a level consistent with available resources and the complexity of the local institutional environment:
 - (1) An assessment of available services that identifies current transportation providers (public, private, and nonprofit);
 - (2) An assessment of transportation needs for individuals with disabilities and seniors. This assessment can be based on the experiences and perceptions of the planning partners or on more sophisticated data collection efforts, and gaps in service;
 - (3) Strategies, activities, and/or projects to address the identified gaps between current services and needs, as well as opportunities to achieve efficiencies in service delivery; and
 - (4) Priorities for implementation based on resources (from multiple program sources), time, and feasibility for implementing specific strategies and/or activities identified.

Samples for these steps are provided under Attachments 1-3.

- c. Local Flexibility in the Update of a Local Coordinated Public Transit-Human Services Transportation Plan. The decision for determining which agency has the lead for the development and coordination of the planning process

should be made at the state, regional, and local levels. FTA recognizes the importance of local flexibility in developing plans for human service transportation. Therefore, the lead agency for the coordinated planning process may be different from the state or the agency that will serve as the designated recipient for the Section 5310 program. Further, FTA recognizes that many communities have conducted assessments of transportation needs and resources regarding individuals with disabilities and seniors. FTA also recognizes that some communities have taken steps to develop a comprehensive, coordinated human service transportation plan either independently or through United We Ride efforts. FTA supports communities building on existing assessments, plans, and action items. As new federal requirements must be met, communities may need to modify their plans or processes as necessary to meet these requirements. FTA encourages communities to consider inclusion of new partners, new outreach strategies, and new activities related to the targeted programs and populations.

Plans will vary based on the availability of resources and the existence of populations served under these programs. A rural community may develop its plans based on perceived needs emerging from the collaboration of the planning partners, whereas a large urbanized community may use existing data sources to conduct a more formal analysis to define service gaps and identify strategies for addressing the gaps.

All “planning” activities undertaken in urbanized areas, regardless of the funding source, must be included in the Unified Planning Work Program of the applicable MPO.

- d. Tools and Strategies for Developing a Coordinated Plan. Communities may approach the development of a coordinated plan in different ways. The amount of available time, staff, funding, and other resources should be considered when deciding on specific approaches. Regardless of the method chosen, seniors; individuals with disabilities; representatives of public, private, and nonprofit transportation and human service providers; and other members of the public must be involved in the development and approval of the coordinated plan. The following is a list of potential strategies for consideration:

- (1) Community planning session. A community may choose to conduct a local planning session with a diverse group of stakeholders in the community. This session would be intended to identify needs based

on personal and professional experiences, identify strategies to address the needs, and set priorities based on time, resources, and feasibility for implementation. This process can be done in one meeting or over several sessions with the same group. It is often helpful to identify a facilitator to lead this process. Also, as a means to leverage limited resources and to ensure broad exposure, this could be conducted in cooperation, or coordination, with the applicable metropolitan or statewide planning process.

Self-assessment tool. *The Framework for Action: Building the Fully Coordinated Transportation System*, developed by FTA and available at <http://www.unitedweride.gov/FFA-Intro.pdf>, helps stakeholders realize a shared perspective and build a roadmap for moving forward together. The self-assessment tool focuses on a series of core elements that are represented in categories of simple diagnostic questions to help groups in states and communities assess their progress toward transportation coordination based on standards of excellence. There is also a *Facilitator's Guide* <http://www.unitedweride.gov/FFA-FacilitatorsGuide.pdf> that offers detailed advice on how to choose an existing group or construct an ad hoc group. In addition, it describes how to develop elements of a plan, such as identifying the needs of targeted populations, assessing gaps and duplication in services, and developing strategies to meet needs and coordinate services.

- (2) Focus groups. A community could choose to conduct a series of focus groups within communities that provides opportunity for greater input from a greater number of representatives, including transportation agencies, human service providers, and passengers. This information can be used to inform the needs analysis in the community. Focus groups also create an opportunity to begin an ongoing dialogue with community representatives on key issues, strategies, and plans for implementation.
- (3) Survey. The community may choose to conduct a survey to evaluate the unmet transportation needs within a community and/or available resources. Surveys can be conducted through mail, e-mail, or in-person interviews. Survey design should consider sampling, data collection strategies, analysis, and projected return rates. Surveys should be designed taking accessibility considerations into account,

including alternative formats, access to the Internet, literacy levels, and limited English proficiency.

(4) Detailed study and analysis. A community may decide to conduct a complex analysis using inventories, interviews, Geographic Information Systems (GIS) mapping, and other types of research strategies. A decision to conduct this type of analysis should take into account the amount of time and funding resources available, and communities should consider leveraging state and MPO resources for these undertakings.

1. PARTICIPATION IN THE COORDINATED PUBLIC TRANSIT-HUMAN SERVICES TRANSPORTATION PLANNING PROCESS. Recipients shall certify that the coordinated plan was developed and approved through a process that included participation by seniors; individuals with disabilities; representatives of public, private, and nonprofit transportation and human services providers; and other members of the public. See Attachment 4 for a sample letter. Note that the required participants include not only transportation providers but also providers of human services, and members of the public who can provide insights into local transportation needs. It is important that stakeholders be included in the development, approval, and implementation of the local coordinated public transit-human service transportation plan. A planning process in which stakeholders provide their opinions but have no assurance that those opinions will be considered in the outcome does not meet the requirement of “participation.” Explicit consideration and response should be provided to public input received during the development of the coordinated plan. Stakeholders should have reasonable opportunities to be actively involved in the decision-making process at key decision points, including, but not limited to, development and approval of the proposed coordinated plan document. The following possible strategies facilitate appropriate inclusion:
 - a. Adequate Outreach to Allow for Participation. Outreach strategies and potential participants will vary from area to area. Potential outreach strategies could include notices or flyers in centers of community activity, newspaper or radio announcements, e-mail lists, website postings, and invitation letters to other government agencies, transportation providers, human services providers, and advocacy groups. Conveners should note that not all potential participants have access to the Internet and they should not rely exclusively on electronic communications. It is useful to allow many ways to participate, including in-person testimony, mail, e-mail, and teleconference. Any public meetings regarding the plan should be held

in a location and time where accessible transportation services can be made available and adequately advertised to the general public using techniques such as those listed above. Additionally, interpreters for individuals with hearing impairments and English as a second language and accessible formats (e.g., large print, Braille, electronic versions) should be provided as required by law. Contact information to request an interpreter or accessible format should be stated in all notifications.

- b. Participants in the Planning Process. Metropolitan and statewide planning under 49 U.S.C. 5303 and 5304 require consultation with an expansive list of stakeholders. There is significant overlap between the lists of stakeholders identified under those provisions (e.g., private providers of transportation, representatives of transit users, and representatives of individuals with disabilities) and the organizations that should be involved in preparation of the coordinated plan.

The projects selected for funding under the Section 5310 program must be “included in a locally developed, coordinated public transit-human services transportation plan” that was “developed and approved through a process that included participation by seniors, individuals with disabilities, representatives of public, private, and non-profit transportation and human services providers and participation by other members of the public.” The requirement for developing the local public transit-human services transportation plan is intended to improve services for people with disabilities and seniors. Therefore, individuals, groups, and organizations representing these target populations should be invited to participate in the coordinated planning process. Consideration should be given to including groups and organizations such as the following in the coordinated planning process if present in the community:

(1) Transportation partners:

- (a) Area transportation planning agencies, including MPOs, councils of government (COGs), rural planning organizations (RPOs), regional councils, associations of governments, state departments of transportation, and local governments;
- (b) Public transportation providers, including ADA paratransit providers and agencies administering the projects funded under FTA urbanized and rural programs;

- (c) Private transportation providers, including private transportation brokers, taxi operators, vanpool providers, school transportation operators, and intercity bus operators;
 - (d) Nonprofit transportation providers, including volunteer programs;
 - (e) Past or current organizations funded under the Section 5310, JARC, and/or the New Freedom programs; and
 - (f) Human service agencies funding, operating, and/or providing access to transportation services.
- (2) Passengers and advocates:
- (a) Existing and potential riders, including both general and targeted population passengers (individuals with disabilities and seniors);
 - (b) Protection and advocacy organizations;
 - (c) Representatives from independent living centers; and
 - (d) Advocacy organizations working on behalf of targeted populations.
- (3) Human service partners:
- (a) Agencies that administer health, employment, or other support programs for targeted populations. Examples of such agencies include but are not limited to departments of social/human services, employment one-stop services, vocational rehabilitation, workforce investment boards, Medicaid, community action programs (CAP), Agency on Aging (AoA), Developmental Disability Council, community services board;
 - (b) Nonprofit human service provider organizations that serve the targeted populations;
 - (c) Job training and placement agencies;
 - (d) Housing agencies;
 - (e) Healthcare facilities; and
 - (f) Mental health agencies.
- (4) Other:

- (a) Security and emergency management agencies;
- (b) Tribes and tribal representatives;
- (c) Economic development organizations;
- (d) Faith-based and community-based organizations;
- (e) Representatives of the business community (e.g., employers);
- (f) Appropriate local or state officials and elected officials;
- (g) School districts; and
- (h) Policy analysts or experts.

Note: Participation in the planning process will not bar providers (public or private) from bidding to provide services identified in the coordinated planning process. This planning process differs from the project selection process, and it differs from the development and issuance of a request for proposal (RFP) as described in the common grant rule (49 CFR part 18 and part 19).

- c. Levels of Participation. The suggested list of participants above does not limit participation by other groups, nor require participation by every group listed. Communities will have different types of participants depending on population and size of community, geographic location, and services provided at the local level. FTA expects that planning participants will have an active role in the development, approval, adoption, and implementation of the plan. Participation may remain low even though a good faith effort is made by the lead agency to involve passengers; representatives of public, private, and nonprofit transportation and human services providers; and others. The lead agency convening the coordinated planning process should document the efforts it utilized, such as those suggested above, to solicit involvement.

In addition, federal, state, regional, and local policy makers, providers, and advocates should consistently engage in outreach efforts that enhance the coordinated process because it is important that all stakeholders identify the opportunities that are available in building a coordinated system.

Adoption of a Plan. As a part of the local coordinated planning process, the lead agency in consultation with participants should identify the process for

approving and adopting the plan and this process must include participation by stakeholders identified in the law: seniors; individuals with disabilities; representatives of public, private, and nonprofit transportation and human service providers; and other members of the public.

FTA will not formally review and approve coordinated plans. MDOT will review and provide necessary comments on all coordinated plans. The grant application will document the plan from which each project listed is included, including the lead agency, the date of adoption of the plan, or other appropriate identifying information.

RELATIONSHIP TO OTHER TRANSPORTATION PLANNING PROCESSES.

- a. Relationship Between the Coordinated Planning Process and the Metropolitan Transportation Planning Processes. The coordinated plan may either be developed separately from the metropolitan transportation planning process and then incorporated into the broader plans, or be developed as a part of the metropolitan transportation planning process. If the coordinated plan is not prepared within the broader process, the lead agency for the coordinated plan should ensure coordination and consistency between the coordinated planning process and metropolitan planning processes. For example, planning assumptions should not be inconsistent.

Projects identified in the coordinated planning process and selected for FTA funding must be incorporated into both the TIP and STIP in UZAs with populations of 50,000 or more; and incorporated into the STIP for rural areas fewer than 50,000 in population. Depending on the projects resulting from the coordinated planning and selection process, a single line item on the TIP/STIP for capital or operating projects may be sufficient. The lead agency developing the coordinated plan should communicate with the relevant MPOs at an early stage in plan development.

Depending upon the structure established by local decision makers, the coordinated planning process may or may not become an integral part of the metropolitan transportation planning processes. State and local officials should consider the fundamental differences in scope, time horizon, and level of detail between the coordinated planning process and the metropolitan transportation planning processes. However, there are important areas of overlap between the planning processes, as well. Areas of overlap represent opportunities for sharing and leveraging resources between the planning processes for such activities as: (1) needs

assessments based on the distribution of targeted populations and locations of employment centers, employment-related activities, community services and activities, medical centers, housing, and other destinations; (2) inventories of transportation providers/resources, levels of utilization, duplication of service, and unused capacity; (3) gap analysis; (4) any eligibility restrictions; and (5) opportunities for increased coordination of transportation services. Local communities may choose the method for developing plans that best fits their needs and circumstances.

- b. Relationship between the Requirement for Public Participation in the Coordinated Plan and the Requirement for Public Participation in Metropolitan and Statewide Transportation Planning. Title 49 U.S.C. 5303(i)(6) and 5304(f)(3), as amended by MAP-21, require MPOs and states to engage interested parties in preparing transportation plans, TIPs, and STIPs. “Interested parties” include, among others, affected public agencies, private providers of transportation, representatives of users of public transportation, and representatives of individuals with disabilities.

MPOs may work with the lead agency developing the coordinated plan to coordinate schedules, agendas, and strategies of the coordinated planning process with metropolitan in order to minimize additional costs and avoid duplication of efforts. MPOs must still provide opportunities for participation when planning for transportation related activities beyond the coordinated public transit-human services transportation plan.

- c. Cycle and Duration of the Coordinated Plan. At a minimum, the coordinated plan should follow the update cycles for metropolitan transportation plans (MTPs) (i.e., four years in air quality nonattainment and maintenance areas and five years in air quality attainment areas). MPOs, designated recipients, and public agencies that administer or operate major modes of transportation should set up a cycle that is conducive to and coordinated with the metropolitan planning processes to ensure that selected projects are included in the TIP and STIP and to receive funds in a timely manner.
- d. Role of Transportation Providers that Receive FTA Funding Under the Urbanized and Rural Area Formula Grant Programs in the Coordinated Planning Process. Recipients of Section 5307 and Section 5311 assistance are the “public transit” in the public transit-human services transportation plan and their participation is assumed and expected. Further, 49 U.S.C. 5307(b)(5), as amended by MAP-21, requires that, “Each recipient of a

grant shall ensure that the proposed program of projects (POP) provides for the coordination of public transportation services ... with transportation services assisted from other United States Government sources.” In addition, 49 U.S.C. 5311(b)(2)(C)(ii) requires the Secretary of DOT to determine that a state’s Section 5311 projects “provide the maximum feasible coordination of public transportation service ... with transportation service assisted by other federal sources.” Finally, under the Section 5311 program, states are required to expend 15 percent of the amount available to support intercity bus service. FTA expects the coordinated planning process in rural areas to take into account human service needs that require intercity transportation.

ATTACHMENT 1

Sample Assessment of Current Services

The total county population, according to the 2010 US Census, is 100,000. The following table provides an indication of the number of transportation disadvantaged persons in <agency area>.

TABLE I

Transportation Disadvantaged Population, <agency area>

	<u>Actual</u>	<u>Percent of Total</u>
Elderly (age 65 and over)	12,000	12
Persons with Disabilities	4,000	4
Unemployed Individuals	5,000	5
Households with incomes below poverty level	3,000	10
Households with no automobile available	1,500	5

Source: U.S. CENSUS OF POPULATION, 2010 U.S. Bureau of the Census.

Of the total county population, 40,000 (40 percent) persons reside in urban places greater than 7,500, and 60,000 (60 percent) reside in rural areas. The <agency area> (population 30,000) is the seat of county government and houses the majority of retail businesses, health care facilities, governmental services, human service agencies, and employers in <agency area>. Many elderly persons and persons with disabilities reside in isolated rural areas of the county. The lack of mobility has prevented significant numbers of these individuals from obtaining essential goods and services. Fifty percent of the households with incomes below the poverty level also live in the rural areas of the county. Eighty 80 percent of unemployed individuals live in the rural area or can't find transportation to go to and from jobs in the city. The great majority of travel demand is, therefore, for service from rural outlying county areas to the city outside of the <agency service area>. There also exists a need, however, to transport persons to senior citizen nutrition program meal sites in the smaller communities of < xxxx>.¹

Demand also exists for social and recreational group outings to various county locations. Proposed additions to the <agency area>Community Hospital in the city of <xxxx>

¹ See accompanying location map.

include plans to add a physical therapy/rehabilitation unit which is expected to generate additional travel demand from out-county areas.

< Company> is going to build a manufacturing plant in the city that will employ 450 people.

Existing Transit Services

The <agency area> has had public transportation since <Month/Year> when a public demand-responsive (door-to-door) service was initiated. The <ABC Transit System> provides service to city residents with a fleet of five 8 to 12 passenger small buses, three of which are equipped to accommodate wheelchair users. This system has provided city residents a high level of public transportation service. It operates seven days a week during the following hours:

Monday - Friday	6:00 a.m. to 6:00 p.m.
Saturday - Sunday	7:30 a.m. to 6:00 p.m.

Its fare structure is \$1.50 for adults and students, and 75 cents for the elderly or persons with disabilities and children under 12 years.

The Salvation Army has two 5310 vehicles, one station wagon and one 8 passenger van, which are used in support of that agency's programs. The vehicles are driven by volunteers with no charge to the passenger. The transportation provided by the Salvation Army program is on an "as-needed" basis and is not regularly scheduled. Most trips occur within the <agency area>.

The <County Council on Aging> has two Section 5310 lift-equipped small buses. These vehicles are used mainly for trips within the city.

Many times the Salvation Army and the Council on Aging vehicles travel to the same places when they take their clients for medical appointments and other things.

At present, no transit services are available in any area of the county outside of the <agency area>.

ATTACHMENT 2

Sample Assessment of Transportation Needs

There is a demonstrated need for transportation service in rural portions of West County to accommodate seniors and individuals with disabilities. The use of volunteer drivers, reimbursed for driving their own vehicles, has been considered to help in the transportation of seniors and individuals with disabilities. There are not a sufficient number of these drivers to meet existing needs, nor is such a practice deemed sufficiently reliable to provide the needed level of service. Volunteer drivers do not have accessible vehicles that would be needed for people with disabilities.

By identifying the unmet needs of the county, stakeholders were able to ascertain the services that are most appropriate and useful to provide access to the community. In light of the unmet needs, an array of service alternatives to accommodate varying transportation needs of the area was considered.

ATTACHMENT 3

Sample Listing of Strategies and/or Activities to Address Identified Gaps.

- Coordinated effort to inform the public of all transportation alternatives in the county.
- Explore ways that the Midville Transit System can expand its service to start providing service outside the city. One suggestion was for the transit system to become a county wide transit authority.
- Fixed routes going from the city and back to bring people in for jobs and services.
- Coordinating all scheduling and dispatching functions under the transit system to eliminate duplication of service.
- Provide demand response service outside of the city.
- Provide transportation to jobs in the city, especially to the new tire manufacturing plant.
- Coordinate scheduling with tire manufacturing plant.
- Provide better coordination of 5310 vehicles to avoid duplication of service.
- Purchase more vehicles.
- Employer vanpool services.

ATTACHMENT 4

Sample Meeting/workshop Invitation Letter

Date of Letter

You are invited to participate in a meeting/workshop to identify the human service transportation needs of <agency area>. The meeting/workshop will be held on date of meeting, time of meeting, place of meeting. Please RSVP to: (*insert name and contact information of person to RSVP to*). Additionally, interpreters for individuals with hearing impairments and English as a second language and accessible formats (e.g., large print, Braille, electronic versions) can be requested. Please contact: (*insert name and contract information of person*).

Federal authorization, MAP-21, requires that projects selected for funding under the Section 5310 program be “included in a locally developed, coordinated public transit-human services transportation plan” and that the plan be “developed and approved through a process that includes participation by seniors, individuals with disabilities, representatives of public, private, and nonprofit transportation and human services providers and other members of the public.”

*Insert a paragraph describing why this plan is important to your community, such as – it is **required** for your agency to apply for federal and state funds to continue existing transportation to work services your agency is providing (describe them briefly)... or it will allow you to make application for new federal funds for new or expanded transportation services aimed at low income individuals and/or persons with disabilities... or it is **required** for your agency to apply for federal and state funds to replace vehicles currently be used by For services aimed at persons with disabilities and the elderly.*

In addition to making us eligible to apply for federal and state funds, coordinated planning is important to our community on a long term basis. The effect of a coordinated system multiplies the service provided by individual providers. There are unmet transportation needs in all communities that we should be working together to meet. Repeated studies identify the lack of transportation as among the top obstacles to employment and full participation in community life for older adults, persons with disability, low income families and others. Coordination is the best way to stretch scare transportation resources and improve mobility for everyone.

You have been identified as a provider of transportation or someone interested in transportation issues for people living in the county. We are inviting you to participate in a meeting/workshop to develop a plan to identify the transportation needs of the county and to help improve services.

To facilitate discussion at the meeting/workshop, we would like to gather some information prior to the meeting/workshop. Part of the process is an assessment or inventory of available services in the county. Please complete the attached information sheet regarding any transportation services you provide. The plan will also identify transportation needs in the county and develop priorities to address the needs. Please provide an explanation of any needs and ideas to address these needs. The information sheets are due on *(insert date that sheets should be returned by)*.

We look forward to seeing you at the meeting/workshop.

Sincerely,

Enclosure: Information Sheet

Coordinated Plan – Stakeholder Information Sheet

Please complete this sheet and submit it to *(insert name and address)* by *(insert due date)*:

Name of Person/Agency:

For Service Providers:

Service Area:

Type of Service (DR, Fixed Route, Vanpool, etc):

Customers: (Senior, Individual with a Disability, General Public, etc.):

Trip Purpose(s): (Employment, Shopping, Medical, etc.):

Funding Sources: (5310, 5307, 5311, Non FTA, Specialized Services, etc.):

Fares:

Service Hours:

Miles per year:

Trips per year:

Hours per year:

List of Vehicles (include size, lifts, etc.)

For all Stakeholders:

What do you see as the public transportation needs in our area, specifically the needs of individuals with disabilities and seniors?

What do you see as the priority actions/strategies we must take to address these needs: